



## Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact [support@jstor.org](mailto:support@jstor.org).

---

**CORRESPONDENCE.**

---

Editor, "Virginia Law Register":

It would seem that the Legislature at its last session has, probably unwittingly, divested the corporation and hustings courts of the state of the power to authorize ministers of the Gospel to celebrate the rites of marriage. Section 2219 of the Code of 1904 provides that "When a minister of any religious denomination shall, before the court of any county or corporation in this state, produce proof of his ordination \* \* \* such court may make an order authorizing him to celebrate the rites of marriage."

This section was amended by the last Legislature, Acts, 1908. p. 42, so as to read as follows: "When a minister of any religious denomination shall, before the **circuit** court of any county or corporation in this state, or before the judge thereof in vacation, produce proof of his ordination \* \* \* such court or judge thereof in vacation may make an order authorizing him to celebrate the rites of marriage," etc.

WM. BEASLEY.

Lynchburg, Va.

---

**MISCELLANY.**

---

**Judgments against Joint Tort-Feasors.**—A bold but, as might be expected, unsuccessful attempt was made this week in *Howe v. Oliver* by a female plaintiff in person to maintain an action for a tort committed by the defendant's former partner, although she had previously brought and compromised an action against the actual tort-feasor. The authorities are, as every student knows, all against this contention. Technically the defendant was in the position of a joint tort-feasor, and as long ago as the reign of James I., *Cocke v. Jennor* (a case which, said Mr. Justice Channell, was none the worse for being old) decided that satisfaction by one of two joint tort-feasors released the other. The Court of Exchequer Chamber held more recently, in *Brinsmead v. Harrison* (1872), that a judgment in an action against one of several tort-feasors is a bar to an action against the others for the same cause, although the judgment remains unsatisfied. The justice of the latter rule may certainly be questioned, and it does not prevail in the United States, where, says Sir Frederick Pollock, it is all but universally held that judgment without satisfaction is no bar. Chief Baron Kelly justified the English rule on the ground that if the judgment were not a defence the effect would be to encourage any number of vexatious actions wherever there